

CRIMINAL COMPLAINT
(Submitted electronically)

VICTIM

United States District Court	DISTRICT of ARIZONA
United States of America	DOCKET NO.
v. John TURSCAK ; DOB: 1971; United States Citizen	MAGISTRATE'S CASE NO. 23-06412MJ

Complaint for violations of Title 18, United States Code §§ 7, 1113, 113(a)(1), 113(a)(3), and 113(a)(6)

COMPLAINANT'S STATEMENT OF FACTS CONSTITUTING THE OFFENSE OR VIOLATION:

COUNT ONE: On or about November 24, 2023, at or near Tucson, within the District of Arizona, at a place within the special maritime and territorial jurisdiction of the United States, namely Federal Correctional Institution – Tucson, on land acquired for the use of the United States and under its exclusive or concurrent jurisdiction, **John TURSCAK**, with premeditation and malice aforethought, did unlawfully attempt to kill D.C., in violation of Title 18, United States Code, Sections 7 and 1113.

COUNT TWO: On or about November 24, 2023, at or near Tucson, within the District of Arizona, at a place within the special maritime and territorial jurisdiction of the United States, namely Federal Correctional Institution – Tucson, on land acquired for the use of the United States and under its exclusive or concurrent jurisdiction, **John TURSCAK**, did intentionally and knowingly assault D.C. with intent to commit murder, in violation of Title 18, United States Code, Sections 7 and 113(a)(1).

COUNT THREE: On or about November 24, 2023, at or near Tucson, within the District of Arizona, at a place within the special maritime and territorial jurisdiction of the United States, namely Federal Correctional Institution – Tucson, on land acquired for the use of the United States and under its exclusive or concurrent jurisdiction, **John TURSCAK**, did intentionally and knowingly assault D.C. with a dangerous weapon, that is, an improvised knife, with intent to do bodily harm, in violation of Title 18, United States Code, Sections 7 and 113(a)(3).

COUNT FOUR: On or about November 24, 2023, at or near Tucson, within the District of Arizona, at a place within the special maritime and territorial jurisdiction of the United States, namely Federal Correctional Institution – Tucson, on land acquired for the use of the United States and under its exclusive or concurrent jurisdiction, **John TURSCAK**, did intentionally, knowingly, and recklessly assault D.C., resulting in serious bodily injury, in violation of Title 18, United States Code, Sections 7 and 113(a)(6).

BASIS OF COMPLAINANT'S CHARGE AGAINST THE ACCUSED:

On or about November 24, 2023, at approximately 12:30 p.m., at the Federal Correctional Institution (FCI) Tucson, on land acquired for the use of the United States and under its exclusive or concurrent jurisdiction, D.C., an inmate at FCI – Tucson who had previously been convicted of federal crimes in another district, was in the facility's law library. Another inmate, **John TURSCAK**, attacked D.C. with an improvised knife, stabbing D.C. approximately 22 times, causing serious bodily injury. Federal corrections officers immediately responded to the assault and deployed OC spray to subdue **TURSCAK**. **TURSCAK** told the corrections officers that he would have killed D.C. had they not responded so quickly. After **TURSCAK** waived his Constitutional *Miranda* rights, FBI agents interviewed him on November 26, 2023. At that time, **TURSCAK** denied wanting to kill D.C. However, **TURSCAK** stated that he had been thinking about assaulting D.C. for approximately one month because D.C. is a high-profile inmate. **TURSCAK** stated he saw an opportunity to assault D.C. in the law library on Friday, November 24, 2023, the day after Thanksgiving Day commonly known as "Black Friday." **TURSCAK** stated that his attack of D.C. on Black Friday was symbolic with the Black Lives Matter movement and the "Black Hand" symbol associated with the Mexican Mafia criminal organization. D.C. received emergency medical treatment for his injuries at a local hospital.

MATERIAL WITNESSES IN RELATION TO THE CHARGE: None

DETENTION REQUESTED Being duly sworn, I declare that the foregoing is true and correct to the best of my knowledge.	SIGNATURE OF COMPLAINANT DANIEL DOUGLASS Digitally signed by DANIEL DOUGLASS Date: 2023.12.01 09:58:32 -07'00'
AUTHORIZED by AUSAs Matthew C. Cassell and Sarah B. Houston	OFFICIAL TITLE Special Agent Daniel Douglass, Federal Bureau of Investigation

Sworn to telephonically.

SIGNATURE OF MAGISTRATE/JUDGE¹⁾ DATE
December 1, 2023¹⁾ See Federal Rules of Criminal Procedure Rule 3 and 54